

Eric M. Creizman

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Application granted. SO ORDERED.

New York, NY      /s/ John G. Koeltl  
August 16, 2021      John G. Koeltl, U.S.D.J.

August 15, 2021

*By ECF*

The Honorable John G. Koeltl  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:      *United States v. James Jeremy Barbera, 21-CR-154 (JGK)***

Dear Judge Koeltl:

We represent James Jeremy Barbera in the above-referenced matter.

I write to respectfully request that the Court accept my untimely filing of Mr. Barbera's papers submitted in support of his omnibus pretrial motions *nunc pro tunc*. I was unable to complete the necessary papers and filings before midnight on Friday, August 13, 2021, the date the Court set as the deadline for pretrial motions. I completed the filing of Mr. Barbera's pretrial motion papers by ECF on August 15, 2021, at approximately 1:20 p.m.

I apologize for any inconvenience caused to the Court or to the Government.

The Court granted my previous request to extend the deadline for Barbera to file his pretrial motions by one week from August 6, 2021 to August 13, 2021. If the Court grants this application, we respectfully request that the government be permitted to file its opposition papers on or before September 6, 2021 (its deadline is now September 3, 2021), without any other changes to the briefing scheduling.

Hon. John G. Koeltl  
August 15, 2021  
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I thank the Court for its consideration in this matter.

Respectfully,

/s/ Eric M. Creizman

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cc: Joshua A. Naftalis, Esq.  
Assistant United States Attorney